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Administrative Record
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FINAL COMMUNITY RELATIONS PLAN

~~BURLINGTON~~ BURLINGTON NORTHERN RAILROAD TIE TREATMENT SITE
SOMERS, MONTANA

This community relations plan summarizes community concerns and outlines community relations activities to be conducted during Superfund remedial response activities at the Burlington Northern Railroad Tie Treatment Plant in Somers, Montana. U.S. EPA Region VIII has lead responsibility for managing the remedial and community relations activities and supervising site-related activities conducted by the Burlington Northern Company.

This plan is based on interviews with local and state government officials and other interested parties. These interviews were conducted in Somers, Montana during the week of January 7, 1985. The schedule and staffing plan provided in this community relations plan may be revised pending final negotiations between EPA and the potential responsible party, Burlington Northern.

A. SITE BACKGROUND

Somers is a small town, population about 100, located in the northwest corner of Montana. The main urban center in the area is the city of Kalispell, situated 15 miles north of Somers, with a population of roughly 10,000. The area around Somers is noted for year-round recreation activities which include fishing, boating, swimming, hunting, camping, skiing, and other outdoor sports. Somers and the Burlington Northern tie plant are situated on the northwestern shoreline of Flathead Lake. Covering 300 square miles, Flathead Lake is the largest natural freshwater lake in the western United States. In addition, Glacier National Park is thirty miles north of Somers.

The tie treatment plant at Somers has operated since 1901. The plant treats wood ties with a mixture of creosote (coal tar) and diesel oil. The treatment process generates wastewater, or "process water." Process water may pick up some of the creosote mixture used to treat the ties. This mixture contains creosote-derived compounds such as phenolics and polynuclear aromatic hydrocarbons (PAH).

Prior to 1927, there is little information about how the company disposed of wastes from the treatment process. For a period of approximately fifty years, from 1927 to 1971, process water containing creosote was discharged into a holding pond. Overflow from the pond was channeled into a ditch into that drained swampland adjacent to Sandy Beach. Sandy Beach is a stretch of privately-owned beach along Flathead Lake near the tie plant in Somers. Several residents remembered that, in the past, the overflow ditch was called "creosote creek", Sandy Beach smelled of creosote, and creosote was found oozing from the sand in some places. After 1971, Burlington Northern built lined lagoons to collect this process water. In 1984, however, the company

0052224

curtailed use of the lined lagoons in favor of a closed-loop system that recycles the process water and creosote wastes back through the tie treatment process.

The Burlington Northern site was initially investigated by the Montana Department of Health and Environmental Services (MDHES) in February, 1983. This investigation resulted in the listing of the site in October 1984 as a proposed addition to the Superfund National Priorities List (NPL). The listing on the NPL cites possible negative impacts to Flathead Lake and the Somers water supply that is drawn from the Lake. The remedial activities planned for the site pertain to a portion of Burlington Northern property that was used as a holding pond and overflow ditch for creosote wastes from the treatment of railroad ties during the first half of the century.

In 1984, the Burlington Northern Company hired consultants to study the existing and potential threat of contamination to ground water and the Lake posed by the site. The consultants conducted field investigations to obtain data on the surface conditions and ground water of the site. These investigations included sampling of Flathead Lake, nearby private wells, soils, and ground water; installing ground water monitoring wells; and surveying the topography of the area. At the time this community relations plan was prepared, EPA was reviewing the technical work and analyses performed by Burlington Northern's consultants.

B. HISTORY OF COMMUNITY INVOLVEMENT

The town of Somers has historically been viewed as a company town. The community settled around the tie plant to be close to jobs at the plant. Most residents still consider Somers a company town, although only about a third of the people employed by the plant reside in Somers. The currently low level of concern about the site among Somers residents may be attributable in part to the long history the tie plant has shared with the town.

The relationship between the town residents and the company, however, has not always been constructive. Some residents of Somers have complained about the creosote odor that the plant releases. In addition, the town residents have had difficulties negotiating with Burlington Northern on local issues stemming from the company's ownership of property in the town. In particular, townspeople have found it difficult to sublease land owned by Burlington Northern to create parking spaces for the town's Post Office, and to transfer the ownership of the Somers' water system from Burlington Northern to the town. These negotiations have proved frustrating for the town spokespeople because of the high turnover of lawyers and managers at the plant.

There have been no organized community activities to protest or express concern about this site. However, a state health official mentioned that approximately ten years ago, a resident of Somers complained about ground water contamination of his drinking well. The resident was subsequently hooked up to the Somers water system. Also, there were several articles in local newspapers about the site in October 1984, when the proposed listing of the

0052225

site on the NPL was announced. Local newspapers that carried articles about the site at that time include the Bigfork Eagle, the Kalispell Daily Interlake, and the Missoula Missoulian. Since that time, the site has received little community and media attention.

The lack of community activism regarding the Burlington Northern site does not mean that residents of the area are unconcerned about environmental issues. The community feels strongly about Flathead Lake and existing and potential threats to the quality of the Lake. Flathead Lake attracts recreation and wildlife enthusiasts to the area.

Currently, community concern about Flathead Lake is focused primarily on sources of lake contamination other than discharges from the Burlington Northern site. Important lake related issues that have been identified by residents and local officials as areas of local concern include: (1) pollution of the lake from septic systems that accompany lakeside residential development; and (2) threat from a Canadian coal mine project that could severely affect the quality of Flathead River, which empties into the Lake.

There are three organizations that are dedicated to issues concerning Flathead Lake: the Flathead Basin Commission; the Flathead Lakers Association; and the Flathead Protection Association. The Flathead Basin Commission, established by the Montana State Legislature, consists of representatives from government and private organizations who are interested in lake-related topics, such as lake pollution, and land use around the Lake. The Flathead Lakers Association, with roughly 1200 members, consists primarily of residents from the lake area who are concerned about their property rights, and environmental and recreational issues associated with the Lake. The Flathead Protection Association, with a smaller membership of approximately 150 residents, is concerned about residential development along the Lake. In addition, there are several national and statewide environmental organizations in the area that are concerned about all natural resource issues relating to the public lands, forests, and parks in this region of the country. These environmental groups include the Montana Wilderness Society and the Flathead chapters of the Sierra Club and Audubon Society.

C. POTENTIAL ISSUES OF COMMUNITY CONCERN

In conversations with local and state government representatives and private citizens about the site, a major concern of many individuals was that detailed site information was needed in order to demonstrate the presence, nature, and extent of creosote contamination to ground water or the Lake. Notwithstanding this information, current concern over the site is low. Somers residents feel that the beach and the marsh area near the site have improved dramatically over the past 15 years since Burlington Northern curtailed use of the holding pond and overflow ditch. However, given that residents of Flathead County feel protective about Flathead Lake, and the site is surrounded by a fairly strong and aware environmental community, the level of concern about the site could increase dramatically if significant environmental threats to the Lake or wildlife are uncovered. National and

statewide environmental groups could potentially focus significant public attention on the Burlington Northern site and become a very active and vocal segment of the community. The issues discussed below are areas of potential community concern. (A list of specific persons interviewed is provided in Appendix A.)

1. Threat to Wildlife In and Around the Lake. Much community concern centers on the fear that past and recurrent creosote contamination from the marshy area near Sandy Beach adversely affects fish, waterfowl, and other wildlife on the Lake. The Flathead Waterfowl Production Area, managed by U.S. Fish and Wildlife, consists of 600 acres and is located due east of the site. In addition to being the habitat of two bald eagles and a stopping point during the migration of peregrine falcons, the refuge has an area that is closed to hunting. This hunting closure runs three miles along the northern shore of Flathead Lake. At certain times, as many as 20,000 ducks and 3,000 geese visit this area. Several wildlife biologists mentioned the potential fear that long term exposure and/or ingestion of organic compounds may affect reproductive patterns and development of local waterfowl species.

A scientist from the University of Montana Biological Research Station at Yellow Bay expressed concern about biological uptake and bioaccumulation of hazardous substances released from the site into the Lake. Biological uptake refers to the process by which animals ingest or absorb substances. Lake species that have absorbed creosote-contaminated substances may remain unaffected or become deformed or diseased--the effect of prolonged exposure may be long term damage to the lake population of that species. Bioaccumulation refers to the process by which certain chemicals are concentrated with each higher step in the food chain, as a result of larger fish or birds preying on smaller fish, for example. The concern is that creosote-related compounds may be accumulating in long-living fish, such as lake trout and kokanee salmon, as these compounds become concentrated up through the food chain.

2. Threat to Drinking Water Supply. The town of Somers obtains drinking water from the Lake. The intake for the water system is south of the site. Although the water supply was tested and found safe by the MDHES, several residents and health officials expressed concern about past and potential contamination of the water supply. Other individuals, however, remarked that discharges from power-boats present greater threats to water quality. Contamination of the underground aquifer was mentioned as another concern, although most private wells in the area are not used for drinking water.
3. Creosote Odor Complaints. Several area resident complained about creosote odors that emanate from the plant. In addition, county health officials expressed concern about air quality near the plant although they did not know of any health studies on the effect of creosote odors in the area of the plant.

0052227

4. Distrust of Burlington Northern Company. Concern was expressed by residents about the role and participation of the Burlington Northern Company in the remedial action. Several individuals stated that they would not trust information or conclusions about the site obtained from Burlington Northern or their consultants, because of experiences when Burlington Northern was not responsive to other social or environmental issues affecting the community. This distrust was expressed towards the Burlington Northern Company and its many operations and was not directed towards the Somers Tie Plant specifically.

Burlington Northern is currently negotiating to sell the Somers water system, which the company has owned and operated for the town for a nominal fee since installing the system in the early 1900s. Some town residents distrust Burlington Northern's motives in wanting to sell the water system and feel that the company wants to "unload" the system for two reasons: (1) the water system is run down and in need of repair; and (2) the potential liability associated with owning the water system if water is found to be contaminated from the site.

Depending on the resolution of Burlington Northern's role in remedial activities, community distrust of the company could become a greater and more widespread concern. If Burlington Northern conducts site activities, it should be emphasized to the community that EPA will supervise all work at the site.

5. Disagreement and Distrust Among Residents. The residents of Somers are divided on several local issues that are not related to the Burlington Northern site. However, because of these past disagreements, town meetings on the site may be potentially difficult and unproductive. In addition, some residents of the county expressed distrust of Flathead County public officials.

D. OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

The following are the site-specific objectives of the community relations program for the Burlington Northern site in Somers, Montana.

1. Inform other government officials about EPA's activities throughout the duration of the remedial project. Discussions can be conducted in person or by telephone with local officials and other agency personnel to keep them fully informed about all scheduled activities. These discussions should occur soon after the workplan for the site is finalized to inform local officials of the schedule of work for the site.
2. Ensure that accurate and timely information about the site is communicated to the local press, residents of Somers, Flathead Basin Commission, Flathead Lakers Association, Flathead Protection Association, Montana Wilderness Association, and the Flathead chapters of the Sierra Club and Audubon Society. Relevant information to the community includes findings related to environmental concerns, local water quality studies, and negotiations with responsible parties.

0052228

3. Provide ongoing opportunities for citizen input to and comment on the proposed remedial alternatives and provide a mechanism for continual communication with the local community throughout the remedial response.

E. COMMUNITY RELATIONS TECHNIQUES

<u>Techniques</u>	<u>Methodology</u>
Phone contact with local officials and citizens	To inform appropriate government officials and interested citizens about EPA's activities and the schedule of site events. These discussions should be conducted as needed throughout the duration of the remedial project particularly when new or potentially controversial information is released.
Informal discussions with citizens and groups interested in Flathead Lake issues	To clarify issues, answer questions, and explain plans and activities under consideration particularly any issues related to Burlington Northern's involvement in the RI/FS.
News releases and fact sheets	To inform and update the community concerning the schedule and rationale for the RI/FS undertaken at Burlington Northern. News releases and fact sheets should be issued to announce the start of the RI, progress during the RI, and the findings of the FS.
Information repository (located at Kalispell Library)	To establish an information source to be accessed by the community for more detailed information about the site. Repository should include newspaper clippings, historical or background information, and public technical documents, such as the workplan and RI/FS reports.
Minimum three-week public comment period on draft feasibility study	To provide for citizen input to and comment on the remedial alternatives proposed for the Burlington Northern site.
Conduct public meetings	To present the recommended alternative for the site and to solicit public comments. Meetings should be conducted at the start of the RI and during the public comment period on the draft feasibility study report.
Responsiveness summary	To document public inquiries and comments and EPA's responses. The responsiveness summary will be included as part of EPA's Record of Decision (ROD) used to select the final remedy for the Burlington Northern site.

f. SCHEDULE

	Technical Milestones			
	Completed Workplan	Start of Remedial Investigation	During Remedial Investigation	During Feasibility Study
Community Relations Activities				Completed Feasibility Study
Information repository	Setup		Update as needed	
Phone calls to local govt. officials and citizens			(as needed)	
Informal discussions with citizens and local officials			(as needed)	
Fact sheets	•		•	•
News releases	•			•
Public meetings	•			•
3-week Comment Period				
Responsiveness summary				

G. BUDGET AND STAFFING PLAN

0052230

Community relations activities will be conducted primarily by the EPA Region VIII Superfund Community Relations Coordinator, Jane Russo, and EPA Regional Site Project Manager, Eric Finke. Contractor assistance will be provided for community relations implementation as requested by EPA.

<u>Community Relations Activity</u>	<u>Estimated Work Hours</u>
Establish and maintain site information repository	Ongoing throughout RI/FS
Discussions with local government officials	Ongoing throughout RI/FS
Informal community discussions	20 hours
Multi-page fact sheet and press release at start of RI	40 hours
Public meeting on draft FS	20 hours
Multi-page fact sheet and press release for FS public meeting	40 hours
Responsiveness summary	40-60 hours

0052231

APPENDIX A

LIST OF CONTACTS AND INTERESTED PARTIES

COUNTY AGENCIES AND OFFICIALS

Flathead City-County Health Department: (406) 755-5300
723 5th Ave. E., Kalispell, MT 59901

Andy Hide*, Environmental Engineer
Drew Paslawsky*, Environmental Health Specialist

Flathead Regional Development Office: (406) 755-5300
800 S. Main, Kalispell, MT 59901

Nikul Verma*, Planning Director

Flathead County Commissioners: (406) 755-5300
800 S. Main, Kalispell, MT 59901

Henry Oldenberg*
Ken Kreuger
Alan Jacobson

STATE AGENCIES AND OFFICIALS

Montana Bureau of Mines and Geology: (406) 755-4140
P.O. Box 1012, Kalispell, MT 59901

Rodger Noble*, Hydrogeologist

Montana Department of Health and Environmental Sciences:

Solid and Hazardous Waste Bureau (406) 444-2821
Cogswell Building, Helena, MT 59620

Vic Anderson
Mike Rubich*
John Arrigo*
Barbara Karlsen*

Water Quality Bureau (406) 449-4206
Cogswell Building, Helena, MT 59620

Abraham A. Horpestad*

Montana Fish and Wildlife Service: (406) 857-3744
Somers Salmon Hatchery, Somers, MT 59932

Stewart Kineow*, Hatchery Operator

*These individuals were consulted about the site in January 1985.

0052232

FEDERAL AGENCIES AND OFFICIALS

U.S. Environmental Protection Agency:

Eric Finke*, Site Project Officer (406) 449-5414
US EPA Region 8, Montana Office
Federal Building
301 S. Park, Drawer 10096
Helena, MT 59626

Jane Russo*, Community Relations Coordinator (303) 293-1692
US EPA
1860 Lincoln Street
Denver, CO 80295

FLATHEAD LAKE INTEREST GROUPS

Flathead Lakers Association:

Jack Greaves, President (406) 844-3075 (H)
Rollis, MT 59931

Flathead Protection Association:

Arthur Johnson, Vice President (406) 257-1861 (H)
501 4th Ave., East
Kalispell, MT 59901

Flathead Group of the Sierra Club:

Cathy Bruno, Vice President
P.O. Box 13
West Glacier, MT 59936

James Connor* (406) 755-8925 (H)

Flathead Chapter of the Audubon Society:

Lynn Kelly (406) 883-5797
Hillcrest Drive
Polson, MT 59860

Montana Wilderness Association:

Susan Bryan (406) 443-7350
P.O. Box 635
Helena, MT 59624

*These individuals were consulted about the site in January 1985.

OTHER INTERESTED GROUPS AND INDIVIDUALS

Burlington Northern Railroad:

Mel Burda*, Environmental Coordinator (406) 256-4400
Burlington Northern Railroad
2718 Montana Ave.
Billings, MT 59101

Dave Thomas*, Manager (406) 857-3303
Somers Tie Plant
Somers, MT 59932

Flathead Basin Commission:

(406) 883-4897 (H)

Elwin Bennington, former Chairman
Box 1039
Polson, MT 59860

Thurman Trosper*, former Chairman (406) 676-2066 (H)
North Crow
Ronan, MT 59864

Yellow Bay Biological Station:

Dr. Jack Stanford* (406) 928-3301
University of Montana
Biological Station
East Shore
Bigfork, MT 59911

Interested Individuals:

Warren Hersman* (406) 857-3563
P.O. Box 225
Somers, MT 59932

Robin Magaddino* (former manager of (406) 837-4294
wildlife refuge)
2100 Swan Highway
Bigfork, MT 59911

Francis and Jan Van Rinsum* (406) 857-3777
595 Somers Rd.
Somers, MT 59911

*These individuals were consulted about the site in January 1985.

A-4

MEDIA REPRESENTATIVES

0052234

The Daily Interlake:
P.O. Box 8, Kalispell, MT 59901

(406) 755-7000

Jackie Adams

The Missoula Missoulian:
P.O. Box 8029, Missoula, MT 59807

(406) 721-5200

Gordon Gregory

The Big Fork Eagle:
P.O. Box 406, Bigfork, MT 59911

(406) 837-5131

L.D. Gros